



# NATIONAL PARK SERVICE ENVIROFACTS

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Hazardous Waste Management &  
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## HAZARDOUS WASTE RECORDKEEPING

### DEFINITIONS:

**Large Quantity Generator (LQG):** A facility that generates more than 1000 kg (2200 lbs) of hazardous waste per month.

**Small Quantity Generator (SQG):** A facility that generates more than 100 kg (220 lbs) and up to 1000 kg of hazardous waste and/or 1 kg (2.20 lbs) of acutely hazardous waste per month and accumulates less than 6000 kg at any one time.

**Conditionally Exempt SQG (CESQG):** A facility that generates less than 100 kg (220 lbs) of hazardous waste and/or 1 kg (2.20 lbs) of acutely hazardous waste per month.

### Treatment, Storage, and Disposal

**Facility (TSDF):** A facility permitted to receive hazardous waste generated by other facilities and treat, store, or dispose of that waste.

### APPLICABLE STANDARDS

**Federal:** LQGs and SQGs must retain records of certain documents (such as manifests, biennial reports, and waste profile data) pertaining to the management of that waste for at least three years (40 CFR Parts 262.40 through 43, 40 CFR 265, and 40 CFR Part 268.7).

**State:** State regulations typically exceed Federal requirements. For example, they may include annual or quarterly hazardous waste reports.

### REQUIRED RECORDKEEPING

The following records must be kept on file by generators, according to the regulations:

- Waste manifests from offsite disposal (signed copies)
- Biennial reports to the USEPA (LQGs only)
- Land disposal restriction (LDR) certificates for offsite disposal
- Exception reports for non-receipt of manifest signed by the offsite TSDF
- Lab analyses or other records used to conduct waste determination (profiles)
- Hazardous waste training documentation
- Storage area inspection reports (LQGs only)

- Hazardous waste contingency plan (LQGs only)
- Additional reports (such as annual or quarterly) which may be required by state rules
- Additional recordkeeping required by the Agency on a case-by-case basis

### RECORD RETENTION TIME

Records are usually required to be kept for a minimum of three years. For example, reports must be kept for three years from the date of the report. In addition:

- Waste manifests signed by the park must be kept for three years or until the park receives a copy of the manifest signed by the TSDF.
- The TSDF-signed manifest copy must be kept for at least three years from the date the waste was accepted by the initial transporter.
- LDR certificates should be kept for at least five years.
- All waste profile data must be kept for at least three years after the date that type of waste was last shipped.
- Training records should be kept until park closure or three years beyond termination of an employee.
- The retention period is automatically extended during an unresolved enforcement action covering the regulated activity.

### ORGANIZATION OF RECORDS

The simplest way to organize park recordkeeping files is to maintain them all in file cabinet(s) at single location in the facility. However, this approach is usually inefficient or impractical for larger facilities.

As an alternative, consider using a central index kept on a computer network which can be updated from any of several locations where files are stored. That way, if a particular file or document is needed on short notice, it can be easily found. This approach also enhances training and consistency during staff changes.

### GOOD PRACTICES

In addition to regulatory requirements, the following documents and/or files should be retained by generators as good practice, where applicable to your park:

- Waste stream inventory (all wastes: solid, hazardous, and medical, updated every two years)
- Records of inspections (past agency inquiries or internal inspections)
- Hazardous waste fee payment records
- TSDF evaluation reports

### PREPARATION FOR INSPECTIONS

To provide for a smooth agency inspection, files must be complete and accessible. Review the facility hazardous waste file organization throughout the park to ensure that they can be located, that they are well organized, and that they are complete.



Assure that park documents, that are of no relevance to an inspector, are stored in a file which the inspector will not peruse during the visit (thus avoiding disclosure of an issue or information that is beyond the scope of the inspection). Examples of these types of documents include environmental audit reports.

The goal is to have the files that the agency inspector needs prepared and organized to efficiently and effectively use their time and impress upon them that affairs are in order.

### ENVIROFACTS X-REFERENCES

- Environmental Training
- Hazard Communication
- Hazardous Waste Generator Status Determination
- Hazardous Waste Characterization

**SAMPLE INDEX OF RCRA RECORDS**

<b>File No.</b>	<b>Description</b>
<b>1</b>	Manifests for off-site shipments of wastes, subdivided by year.
<b>2</b>	Land Ban Certificates, subdivided by year.
<b>3</b>	Biennial Hazardous Waste Reports (if facility is a LQG).
<b>4</b>	Annual hazardous waste fee payment records.
<b>5</b>	Exception reports, subdivided by year.
<b>6</b>	Lab analysis of wastes shipped off-site (profiles), divided by process.
<b>7</b>	Records used to conduct the hazardous waste determination, including test results, waste analyses, and documentation of any determinations that are based on the generator's knowledge of materials and processes rather than on laboratory analyses.
<b>8</b>	Hazardous waste training records, indexed by employee.
<b>9</b>	Hazardous waste storage area inspection records (LQG only), subdivided by year.
<b>10</b>	Other quarterly or annual reports required by state programs, subdivided by year.

Note: Records must be maintained for a minimum of three (3) years. Land Ban records should be kept for five (5) years.